Mark C. Mao, CA Bar No. 236165 Beko Reblitz-Richardson, CA Bar No. 238027 BOIES SCHILLER FLEXNER I.I.P 44 Montgomery St., 41st Floor San Francisco, CA 94104 Tel.: (415) 293-6800 mmao@bsfllp.com brichardson@bsfllp.com Tel.: (415) 293-6800 mmao@bsfllp.com brichardson@bsfllp.com John Korther J. Sussing J. Suss			
Beko Reblitz-Richardson, CA Bar No. 238027 BOIES SCHILLER FLEXNER LLP 44 Montgomery St., 41st Floor San Francisco, CA 94104 Tel.: (415) 293-6800 mmao@bsfllp.com brichardson@bsfllp.com 5 brichardson@bsfllp.com 6 Jesse Panuccio (admitted pro hac vice) BOIES SCHILLER FLEXNER LLP 1401 New York Ave, NW Washington, DC 20005 Tel.: (202) 237-2727 Fax: (202) 237-6131 jpanuccio@bsfllp.com Amanda K. Bonn, CA Bar No. 270891 SUSMAN GODFREY L.L.P 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel: (310) 789-3150 Tel: (310) 789-3150 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA ANIBAL RODRIGUEZ, JULIAN NA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Tel: (300 GOGLE LLC, Defendant.		Mark C. Mao, CA Bar No. 236165	William Christopher Carmody
BOIES SCHILLER FLEXNER LLP 44 Montgomery St., 41st Floor San Francisco, CA 94104 Tel.: (415) 293-6800 mmao@bsfllp.com brichardson@bsfllp.com BOIES SCHILLER FLEXNER LLP 1301 Avenue of the Americas, 32 nd Floor BOIES SCHILLER FLEXNER LLP 1401 New York Ave, NW Washington, DC 20005 Tel.: (202) 237-2727 Fax: (202) 237-6131 jpanuccio@bsfllp.com 10 10 Amanda K. Bonn, CA Bar No. 270891 SUSMAN GODFREY L.L.P 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel: (310) 789-3150 Tel: (310) 789-3150 Tampa, FL 33602 Tel: (813) 223-5505 jyanchunis@forthepeople.com rmage@forthepeople.com rmage@forthepeople.com rmage@forthepeople.com rmama@forthepeople.com rmama@	1	· · · · · · · · · · · · · · · · · · ·	<u>*</u>
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San Francisco, CA 94104 Tcl.: (415) 293-6800 mmao@bsfllp.com brichardson@bsfllp.com Jesse Panuccio (admitted pro hac vice) BOIES SCHILLER FLEXNER LLP 1401 New York Ave, NW Washington, DC 20005 Fax: (202) 237-2727 Fax: (202) 237-6131 japanuccio@bsfllp.com Amanda K. Bonn, CA Bar No. 270891 SUSMAN GODFREY I.L.P 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tcl:: (310) 789-3150 Abonn@susmangodfrey.com 15 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Plaintiffs, Alexander P. Frawley (admitted pro hac vice) SUSMAN GODFREY L.L.P. SUSMAN GODFREY L.L.P 1301 Avenue of the Americas, 32 nd Floor New York, NY 10019 Tcl.: (212) 336-8330 Tcl.: (212) 336-830 Tcl.: (212) 346-830 Tcl.: (212) 346-830 Tcl.: (212) 346-830 Tcl.: (212) 36-830 Tcl.: (212) 346-830 Tcl	2		
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mmao@bsfllp.com brichardson@bsfllp.com SUSMAN GODFREY L.L.P. Jesse Panuccio (admitted pro hac vice) BOIES SCHILLER FLEXNER LLP Tel.: (212) 336-8330 Boarmody@susmangodfrey.com srabin@susmangodfrey.com srabin@susmangodfre	3	·	•
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Jesse Panuccio (admitted pro hae vice) BOIES SCHILLER FLEXNER LLP 1401 New York Ave, NW Washington, DC 20005 Tel:. (202) 237-2727 Fax: (202) 237-6131 jpanuccio@bsfllp.com Amanda K. Bonn, CA Bar No. 270891 SUSMAN GODFREY L.LP 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel: (310) 789-3150 Fax: (310) 789-3150 Tale: (310) 789-3150	5	brichardson@bsfllp.com	
BOIES SCHILLER FLEXNER LLP 1401 New York Ave, NW Washington, DC 20005 Tel.: (202) 237-2727 shear (202) 237-6131 jpanuccio@bsfllp.com Amanda K. Bonn, CA Bar No. 270891 SUSMAN GODFREY L.L.P 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel: (310) 789-3150 Tel: (310) 789-3150 Tabonn@susmangodfrey.com Attorneys for Plaintiffs UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN CASANTIAGO, HAROLD NYANJOM, HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Plaintiffs, Defendant. Tel.: (212) 336-8330 bcarmody@susmangodfrey.com srabin@susmangodfrey.com sahepard@susmangodfrey.com srabin@susmangodfrey.com john A. Yanchunis (admitted pro hac vice) Ryan J. McGee (admitted pro hac vice) Michael F. Ram (admitted pro hac vice) Ryan J. McGee (admitted pro hac vice) Michael F. Ram (admitted pro hac v	5		32 nd Floor
BOIES SCHILLER FLEXNER LLP 1401 New York Ave, NW Washington, DC 20005 Tel.: (202) 237-2727 Fax: (202) 237-2727 Fax: (202) 237-6131 jpanuccio@bsfllp.com Amanda K. Bonn, CA Bar No. 270891 SUSMAN GODFREY L.L.P 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel: (310) 789-3150 Fax: (310) 789-3150 Tabonn@susmangodfrey.com 15 Attorneys for Plaintiffs Tel: (212) 336-8330 bearmody@susmangodfrey.com sahepard@susmangodfrey.com shepard@susmangodfrey.com jpanuccio@bsfllp.com John A. Yanchunis (admitted pro hac vice) Ryan J. McGee (admitted pro hac vice) Michael F. Ram (admitted pro hac vice) MoRGAN & MORGAN Tel: (310) 789-3150 Tampa, FL 33602 Tel.: (813) 223-5505 jyanchunis@forthepeople.com mram@forthepeople.com mram@forthepeople.com mrame@forthepeople.com mrame@forthepeople.com mrame@forthepeople.com mrame@forthepeople.com mrame@forthepeople.com mrame@forthepeople.com mrame@forthepeople.com for CALIFORNIA ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, PROPOSED ORDER GRANTING ADMINISTRATIVE MOTION TO SEAL PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	6	Jesse Panuccio (admitted pro hac vice)	New York, NY 10019
Washington, DC 20005 Tel.: (202) 237-277 Fax: (202) 237-277 Fax: (202) 237-6131 jpanuccio@bsfllp.com Manda K. Bonn, CA Bar No. 270891 SUSMAN GODFREY LL.P 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel: (310) 789-3100 Fax: (310) 789-3150 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Plaintiffs, Plaintiffs, Defendant.		BOIES SCHILLER FLEXNER LLP	Tel.: (212) 336-8330
Washington, DC 20005 srabin@susmangodfrey.com shepard@susmangodfrey.com shepard@susmangodfrey.com shepard@susmangodfrey.com shepard@susmangodfrey.com shepard@susmangodfrey.com shepard@susmangodfrey.com John A. Yanchunis (admitted pro hac vice) Ryan J. McGee (admitte	7	1401 New York Ave, NW	bcarmody@susmangodfrey.com
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John A. Yanchunis (admitted pro hac vice) Amanda K. Bonn, CA Bar No. 270891 SUSMAN GODFREY L.L.P 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067 Tel: (310) 789-3150 Attorneys for Plaintiffs UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Vs. GOOGLE LLC, Predict of the Stars, Suite 1400 Los Angeles, CA 90067 Tel: (310) 789-3150 Tampa, FL 33602 Tel: (813) 223-5505 Jyanchunis@forthepeople.com rmcgee@forthepeople.com rmm@forthepeople.com rmm@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com rmmogeo@forthepeople.com rmcgee@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ro	9		g
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12 Los Angeles, CA 90067 Tel: (310) 789-3100 Fax: (310) 789-3150 Tampa, FL 33602 Tel: (813) 223-5505 jyanchunis@forthepeople.com Tampa, FL 33602 Tel: (813) 225-505 jyanchunis@forthepeople.com Tampa, FL 33602 Tel: (813) 225-505 jyanchunis@forthepeople.com Tampa, FL 33602 Tel: (813) 225-505 jyanchunis@forthepeople.com Tampa, FL 3602 Tel: (813) 225-505 jyanchunis@forthepeople.com Tampa, FL 3602 Tel: (813) 225-505 Tel: (81	11		
Los Angeles, CA 90067 Tel: (310) 789-3100 Fax: (310) 789-3150 Tampa, FL 33602 Tel: (813) 223-5505 jyanchunis@forthepeople.com rmegec@forthepeople.com ramen@forthepeople.com To UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Vs. GOOGLE LLC, Defendant. MORGAN & MORGÁN 201 N. Franklin Street, 7th Floor Tampa, FL 33602 Tel: (813) 223-5505 jyanchunis@forthepeople.com rmegec@forthepeople.com rmegec@forthepeople.com rame@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com ramen@forthepeople.com rmegec@forthepeople.com rmegec@forthepeople.com ramen@forthepeople.com rmegec@forthepeople.com rmegec@forthepeople.com rmegec@forthepeople.com rmegec@forthepeople.com ramen@forthepeople.com ramen@forthepeo	11		
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abonn@susmangodfrey.com Attorneys for Plaintiffs Tel.: (813) 223-5505 jyanchunis@forthepeople.com rmcgee@forthepeople.com ramen@forthepeople.com ramen@forthep	13		
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Attorneys for Plaintiffs TINCREE® (Forthepeople.com mram@ forthepeople.com ramen@ forthepeople.com 17 UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA 19 ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, 23 Plaintiffs, Plaintiffs, Vs. The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	14	abonn@susmangodfrey.com	
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UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	16		
NORTHERN DISTRICT COURT CALIFORNIA 19 ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, 23 Plaintiffs, PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT 25 VS. The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	10		ramen@forthepeople.com
NORTHERN DISTRICT COURT CALIFORNIA 19 ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, 23 Plaintiffs, PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT 25 VS. The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	17		
ANIBAL RODRIGUEZ, JULIEANNA MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.			
MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Plaintiffs, Vs. GOOGLE LLC, Defendant. Case No.: 3:20-cv-04688 [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO SEAL PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	18	NORTHERN DISTRI	CT OF CALIFORNIA
MUNIZ, ELIZA CAMBAY, SAL CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Plaintiffs, Vs. GOOGLE LLC, Defendant. Case No.: 3:20-cv-04688 [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO SEAL PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	1.0		1
CATALDO, EMIR GOENAGA, JULIAN SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	19	ANIBAL RODRIGUEZ, JULIEANNA	
21 SANTIAGO, HAROLD NYANJOM, KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Vs. GOOGLE LLC, Defendant. [PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO SEAL PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	20	MUNIZ, ELIZA CAMBAY, SAL	Case No.: 3:20-cv-04688
KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, Plaintiffs, Vs. GOOGLE LLC, Defendant. ADMINISTRATIVE MOTION TO SEAL PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	20	CATALDO, EMIR GOENAGA, JULIAN	
KELLIE NYANJOM, and SUSAN LYNN HARVEY, individually and on behalf of all others similarly situated, PORTIONS OF OPPOSITION TO GOOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT Vs. GOOGLE LLC, The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	21	SANTIAGO, HAROLD NYANJOM,	[PROPOSED] ORDER GRANTING
others similarly situated, Plaintiffs, OGOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT Vs. The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	21	KELLIE NYANJOM, and SUSAN LYNN	ADMINISTRATIVE MOTION TO SEAL
others similarly situated, Plaintiffs, OGOGLE'S MOTION TO DISMISS OR STRIKE PORTIONS OF SECOND AMENDED COMPLAINT Vs. The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	22	HARVEY, individually and on behalf of all	PORTIONS OF OPPOSITION TO
Plaintiffs, Plaintiffs, STRIKE PORTIONS OF SECOND AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.		others similarly situated,	GOOGLE'S MOTION TO DISMISS OR
Plaintiffs, No. AMENDED COMPLAINT The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	23	,	STRIKE PORTIONS OF SECOND
vs. The Honorable Richard Seeborg Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.		Plaintiffs.	AMENDED COMPLAINT
Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	24	,	
Courtroom 3 – 17th Floor Date: August 19, 2021 Time: 1:30 p.m.	25	VS.	The Honorable Richard Seeborg
26 GOOGLE LLC, 27 Defendant. Date: August 19, 2021 Time: 1:30 p.m.	23	,	
Time: 1:30 p.m. Defendant.	26	GOOGLELLC	
Defendant.	20	GOOGLE LLC,	
Defendant.	27	Defendant	1 mic. 1.30 p.m.
28	- '	Defendant.	
	28		

[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to Seal portions of Plaintiffs' Opposition to Google's Motion to Dismiss or Strike Portions of the Second Amended Complaint.

Having considered the Administrative Motion, supporting declaration, and other papers on file, and good cause having been shown, the Court **ORDERS** as follows:

Document Sought to	Party Claiming	Court's Ruling on	Basis for Sealing
be Sealed	Confidentiality	Motion to Seal	Portion of Document
Plaintiffs' Opposition	Google	GRANTED as to	Refers to material
to Google's Motion to		redacted portions on	designated
Dismiss or Strike		pages 23-24.	"Confidential" or
Portions of Second			"Highly Confidential –
Amended Complaint			Attorneys' Eyes Only"
			pursuant to the
			Protective Order

IT IS SO ORDERED.

DATED:

Honorable Richard Seeborg Chief United States District Judge